

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2023-9-E**

**PETITION TO INTERVENE**

In re:

Dominion Energy South Carolina,  
Incorporated's 2023 Integrated  
Resource Plan (IRP)

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On January 30, 2023, Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") filed its Integrated Resource Plan 2023 ("2023 IRP") with the Public Service Commission of South Carolina ("Commission").
2. On February 10, 2023, the Commission filed a Notice of Filing and Public Hearing, Dominion Energy South Carolina, Inc.'s 2023 Integrated Resource Plan (IRP) Docket No. 2023-9-E. This notice indicates that petitions to intervene must be emailed to [contact@psc.sc.gov](mailto:contact@psc.sc.gov) no later than Monday, April 24, 2023; or mailed to 101 Executive Center Drive, Suite 100, Columbia, SC 29210 no later than Monday, April 24, 2023.
3. Sierra Club is a nonprofit conservation organization incorporated in California. It currently represents more than 750,000 dues-paying members nationwide and approximately 6,346 dues-paying members in South Carolina. Sierra Club's mission is to explore, enjoy, and

protect the wild places of the Earth; to practice and promote the responsible use of the Earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club and the Sierra Club's South Carolina Chapter work to accelerate the transition from fossil fuels to clean energy solutions and advocate for state and federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

4. The Sierra Club has participated as intervenors in multiple proceedings before the Commission, including, most relevantly, Dominion's 2020 IRP proceeding (Docket No. 2019-226-E), Dominion's 2021 IRP Update (Docket No. 2021-9-E), Dominion's 2022 IRP Update (Docket No. 2022-9-E) and Dominion's Coal Plants Retirement Study Docket (2021-192-E). Other recent dockets Sierra Club participated as intervenor include Docket Nos. 2022-254-E, 2021-93-E, 2020-125-E, 2018-322-E, 2018-321-E, 2018-319-E, 2018-318-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

5. Sierra Club and its more than 6,300 members who live in South Carolina—approximately half of which are Dominion customers—have a direct and substantial interest in this proceeding. As stated, Sierra Club actively participated in Dominion's 2019 IRP proceeding, where the Commission accepted Dominion's 2020 Modified IRP through Order No. 2021-429. Since that proceeding, Sierra Club has actively engaged in the Company's resource planning stakeholder process established pursuant to Order No. 2021-429 and provided

substantial comments in the Coal Retirement Study docket and the 2022 IRP Update. The Company's 2023 IRP implicates Sierra Club's organizational mission and interests.

6. Sierra Club and its members have an interest in ensuring that the 2023 IRP advances the important objectives of promoting cost-saving clean energy, energy efficiency, and distributed generation, and avoiding disproportionate and unreasonable burdens on low-income South Carolinians. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings. No other party will adequately represent Sierra Club's interests in this case.

7. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and interests of its members are represented in the Commission's decision-making process regarding the 2023 IRP. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

8. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

9. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:

Robert Guild  
314 Pall Mall Street  
Columbia, SC 29201  
Tel: (803) 917-5738  
Email: [bguild@mindspring.com](mailto:bguild@mindspring.com)

10. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record and:

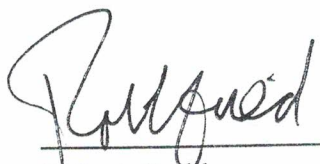
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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this <sup>21<sup>st</sup></sup>~~15<sup>th</sup>~~ day of February, 2023.



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**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2023-9-E**

**CERTIFICATE OF SERVICE**

In re:

Dominion Energy South Carolina,  
Incorporated's 2023 Integrated  
Resource Plan (IRP)

I hereby certify that I have served the persons listed on the official service list for Docket No. 2023-9-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic mail on this <sup>21st</sup> ~~15th~~ day of February, 2023.

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